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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re
JADOOTV, INC.
Debtor.

Bankruptcy Case No. 19-41283 (WJL)

Chapter 11

R.S. No. BN-001

**SECOND JOINT STATUS
CONFERENCE STATEMENT**

Date: July 29, 2020
Time: 10:30 a.m.
Ctrm: TELEPHONIC
Room 220
1300 Clay Street
Oakland, CA 94612

Creditor JPMorgan Chase Bank, N.A. (“**JPMC**”) and debtor JadooTV, Inc. (“**Debtor**”),
through their undersigned counsel, submit the following *Second Joint Status Conference
Statement*.

JPMC and Debtor have reached a settlement in principle regarding the *Motion of Debtor
for an Order Authorizing Incurrence of Unsecured Debt in the Form of Paycheck Protection
Program Loan Pursuant to 11 U.S.C. §§ 364(b) and 105(a) Nunc Pro Tunc to April 7, 2020* [Dkt.
No. 271] (the “**PPP Motion**”) and JPMC’s anticipated motion for relief from the automatic stay.

1 The parties are finalizing the terms of a stipulation to memorialize their agreement (the
2 “**Stipulation**”), whereby the Debtor will stipulate to relief from stay to permit JPMC to exercise
3 its remedies with respect to the PPP loan made to the Debtor and the Debtor’s deposit account
4 with JPMC, including offsetting the deposit account to the extent described in the Stipulation.

5 The parties will seek the Court’s guidance at the July 29, 2020 Status Conference
6 regarding whether the Stipulation must be approved by way of noticed motion, or if the parties
7 may submit the Stipulation and proposed form of order to the Court without such notice.

8 JPMC and the Debtor are prepared to discuss these issues with the Court at the Status
9 Conference.

10 DATED: July 28, 2020

BUCHALTER
A Professional Corporation

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13 By: /s/ Valerie Bantner Peo
VALERIE BANTNER PEO
14 Attorneys for Creditor
JPMorgan Chase Bank, N.A.

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16 DATED: July 28, 2020

KELLER BENVENUTTI KIM LLP

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18 By: /s/ Jane Kim
JANE KIM
19 Attorneys for Debtor
20 JadooTV, Inc.